

Philippe Z. Selendy
Jennifer M. Selendy
Claire E. O'Brien
Laura M. King
SELENDY GAY PLLC
1290 Avenue of the Americas
New York, New York 10104
(212) 390-9000
pselendy@selendygay.com
jselendy@selendygay.com
cobrien@selendygay.com
lking@selendygay.com

*Attorneys for Genesis Global Holdco, LLC,
Genesis Global Capital, LLC, and Genesis
Asia Pacific Pte. Ltd.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: In re Genesis Global Holdco, LLC, <i>et al.</i> , Debtors. ¹	Chapter 11 Case No.: 23-10063 (SHL) Jointly Administered
--	--

**DECLARATION OF CLAIRE E. O'BRIEN IN SUPPORT OF DEBTORS' MOTION TO
ENFORCE THE PLAN AGAINST DIGITAL CURRENCY GROUP, INC.**

I, Claire E. O'Brien, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner at the firm Selendy Gay PLLC, counsel to Debtors Genesis Global Holdco, LLC, Genesis Global Capital, LLC and Genesis Asia Pacific Pte. Ltd (the "Debtors").
2. I submit this declaration in support of the Debtors' Motion to Enforce the Plan Against Digital Currency Group, ECF No. 2180.

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Genesis Global Holdco, LLC (8219), Genesis Global Capital, LLC (8564), and Genesis Asia Pacific Pte. Ltd. (2164R).

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Notice of Removal filed by Digital Currency Group, Inc. on June 12, 2025 at ECF No. 1 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Opening Brief in Support of Plaintiffs' Motion to Remand filed by the Debtors on June 13, 2025 at ECF No. 5 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Defendants' Answering Brief in Opposition to the Plaintiffs' Motion to Remand filed by DCG on June 28, 2025 at ECF No. 26 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Reply Brief in Support of Plaintiffs' Motion to Remand filed by the Debtors on July 7, 2025 at ECF No. 34 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

7. Attached hereto as **Exhibit 5** is a true and correct copy of the Opening Brief in Support of Defendants' Motion to Transfer Pursuant to 28 U.S.C. § 1412 and 28 U.S.C. § 1404(a) filed by DCG on June 20, 2025 at ECF No. 19 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

8. Attached hereto as **Exhibit 6** is a true and correct copy of the Answering Brief in Opposition to Defendants' Motion to Transfer filed by the Debtors on June 30, 2025 at ECF No. 28 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

9. Attached hereto as **Exhibit 7** is a true and correct copy of the Reply Brief in Support of Defendants' Motion to Transfer Pursuant to 28 U.S.C. § 1412 and 28 U.S.C. § 1404(a) filed by

DCG on July 7, 2025 at ECF No. 36 in the case captioned *Genesis Glob. HoldCo, LLC v. Digital Currency Grp., Inc.*, 25-cv-733 (D. Del.).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 14, 2025

/s/ Claire E. O'Brien
Claire E. O'Brien

Attorney for Genesis Global Holdco, LLC, Genesis Global Capital, LLC, and Genesis Asia Pacific Pte. Ltd.